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STANFORD L. KURLAND

13 MAINE STATE RETIREMENT  
14 SYSTEM, Individually and On Behalf  
of All Others Similarly Situated,

15 Plaintiffs,

16 || v.

17 COUNTRYWIDE FINANCIAL  
18 CORPORATION,  
a Delaware corporation, et al.,

19 Defendants.

Case No. CV 10-0302-MRP (MANx)

**DEFENDANT STANFORD L.  
KURLAND'S REPLY IN SUPPORT  
OF REQUEST FOR JUDICIAL  
NOTICE IN SUPPORT OF  
MOTION TO DISMISS COUNTS I  
AND III OF THE AMENDED  
CONSOLIDATED CLASS ACTION  
COMPLAINT**

**Date:** October 18, 2010  
**Time:** 11:00 a.m.  
**Crtrm.:** 12

Trial Date: None Set

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1       The Request for Judicial Notice filed by Defendant Stanford L. Kurland  
2 (“Kurland”) (Dkt. No. 150) asks that the Court take notice of the Form 8-K filed  
3 with the SEC by Countrywide Financial Corporation (“Countrywide”), dated  
4 September 8, 2006, and the fact contained therein that Kurland was terminated as  
5 Countrywide’s President and Chief Operating Officer of Countrywide on  
6 September 7, 2006. (Dkt. Nos. 150-151.) Kurland’s departure date—reported by a  
7 publicly traded company in a periodic report filed with the Securities and Exchange  
8 Commission—“cannot reasonably be questioned,” Fed. R. Evid. 201(b)(2), and  
9 Plaintiffs do not argue to the contrary in their opposition to defendants’ requests for  
10 judicial notice. (*See* Dkt. No. 183 at 4.) Accordingly, the Court should grant  
11 Kurland’s Request for Judicial Notice. Kurland also joins in the requests for judicial  
12 notice and supporting arguments of other defendants.

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14 DATED: September 27, 2010                   Respectfully submitted,

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16   Caldwell Leslie & Proctor, PC  
17   Christopher G. Caldwell  
18   David C. CodeLL, Of Counsel  
19   Andrew Esbenshade

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22   By \_\_\_\_\_ /s/  
23   David C. CodeLL  
24   Attorneys for Defendant  
25   Stanford L. Kurland  
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